

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	Case No. 20-30599
DEBRA DENESE WILLIAMS,	§	
	§	
	§	
Debtor(s)	§	Chapter 7

MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.
Represented parties should act through their attorney.

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Debtor Debra Denese Williams, files this Motion to Convert Case from Chapter 7 to Chapter 13 pursuant to 11 U.S.C. § 706. The above-named Debtor requests that this court enter an Order converting this case under Chapter 7 to a case under Chapter 13 of the Bankruptcy code (title 11 of the United States Code), on the grounds set forth below.

1. On January 24, 2020, the above named Debtor filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code.
2. On February 14, 2020, the mortgage lender for Debtor's primary residence, Midfirst Bank, filed a Motion for Relief from Stay Regarding Exempt Property (docket #13) ("Motion for Relief").

3. Debtor wishes to convert her case to a Chapter 13 so that she may properly address the Motion for Relief and file a Chapter 13 Plan which will allow her to save her primary residence.

4. This case has not been previously converted under 11 U.S.C. § 1112, § 1208, or § 1307.

5. The name of the Trustee appointed is Allison D. Byman.

6. Debtor alleges that the motion is filed in good faith, and that Debtor is eligible for relief under the Chapter for which conversion is requested.

WHEREFORE, PREMISES CONSIDERED, Debtor Debra Denese Williams, respectfully requests this Court issue an Order converting this case under Chapter 7 to Chapter 13 of the Bankruptcy Code.

Dated: March 3, 2020

Respectfully submitted,

/s/ Nicholas M. Wajda
Nicholas M. Wajda
Wajda & Associates, APC
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The signature below certifies that a true and correct copy of the foregoing document has been served electronically on March 3, 2020, on the following:

Allison D Byman, adb@bymanlaw.com
United States Trustee, USTPRegion07.HU.ECF@USDOJ.GOV
MIDFIRST BANK, Jessica Holt, jholt@mwzmlaw.com
Michael W Zientz, txsd@mwzmlaw.com
PRA Receivables Management, LLC, claims@recoverycorp.com

The signature below certifies that a true and correct copy of the foregoing document has been served by first class, U.S. mail, postage prepaid on March 3, 2020, on the following:

Honorable Christopher M. Lopez
515 Rusk, Courtroom 401
Houston, TX 77002

*****See attached additional service list.**

Dated: March 3, 2020

Respectfully submitted,

/s/ Charla Weipz
Charla Weipz, Legal Assistant
Wajda & Associates, APC
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United States Bankruptcy Court

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Houston, TX 77208-1010

AES/PHEAA

Attn: Bankruptcy

Po Box 2461

Harrisburg, PA 17105-2461

Avant

Attn: Bankruptcy

Po Box 9183380

Chicago, IL 60691-3380

Carmax Auto Finance

P.O. Box 3174

Milwaukee, WI 53201-3174

Connexus CU

Attn: Bankruptcy

Po Box 8026

Wausau, WI 54402-8026

Conns

Attn: Bankruptcy

2445 Technology Forest Blvd, Bldg 4, Ste

The Woodlands, TX 77381-5258

Credit Collection Services

Po Box 607

Norwood, MA 02062-0607

Fingerhut

Attn: Bankruptcy

Po Box 1250

Saint Cloud, MN 56395-1250

Great Lakes

Attn: Bankruptcy

Po Box 7860

Madison, WI 53707-7860

Midland Mortgage C

Attn: Customer Service/ Bankruptcy

P.O. Box 26648

Oklahoma City, OK 73126-0648

Midnight Velvet/Swiss Colony

Attn: Bankruptcy

1112 Seventh Ave

Monroe, WI 53566-1364

Synch/ccdstr

Attn: Bankruptcy

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US Trustee

Office of the US Trustee

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